



**United Airlines submits the following comment for AD 2008-23-07:**

FAA AD 2008-23-07 states that crew members must immediately don oxygen masks *anytime* the intermittent warning horn sounds in flight. While the intent of this document is to ensure that crews do not mistake the cabin altitude warning horn for the takeoff warning horn, and subsequently put the airplane at risk to hypoxic conditions, the current phrasing of this AD places the aircraft in danger should the intermittent warning horn sound in a critical phase of flight in close proximity to the ground.

The way the B737 is designed, the cabin altitude warning horn can only sound when the cabin altitude has exceeded 10,000 feet. This can only occur when the airplane altitude exceeds 10,000 feet MSL. Below 10,000 feet MSL, we would argue that any intermittent warning horn can only be the takeoff warning horn. A failure of the air/ground sensor on takeoff would result in an intermittent warning horn sounding when the flaps are retracted at approximately 1000 feet AFE. To comply with the AD as currently written, the crews would be required to immediately don oxygen masks, establish crew communications, accomplish the Intermittent Warning Horn Emergency Procedure and verify the cabin altitude on the indicator prior to removing the masks. United Airlines contends that these procedures at 1000 feet AFE place the airplane in significantly more danger of a mid air collision with VFR traffic, or a loss of airplane control due to the distractions that the procedures required by the AD have caused. It is *impossible* for the dual purpose intermittent warning horn on the B737 to indicate a pressurization problem below 10,000 feet MSL.

Therefore in the interest of safety, United Air Lines, Inc. would like to request this AD be changed to only require the response to the intermittent warning horn be accomplished when the airplane altitude exceeds 10,000 feet MSL. Specifically, the AD procedures would be amended as follows:

- Whenever the intermittent warning horn sounds in flight *above 10,000 feet MSL*:
  1. Immediately don oxygen masks and set regulators to 100%.
  2. Establish crew communications.
  3. Do the CABIN ALTITUDE WARNING OR RAPID DEPRESSURIZATION checklist.
- Both pilots must verify on the overhead Cabin Altitude Panel that the cabin altitude is stabilized at or below 10,000 feet before removing oxygen masks.

For further information contact:

Ken Schmidt  
Flight Operations Engineer, Operational Engineering  
United Airlines SF Maintenance Center - SFOEG  
San Francisco, CA. 94128 Tel: 650-634-7063  
ken.schmidt@united.com